

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

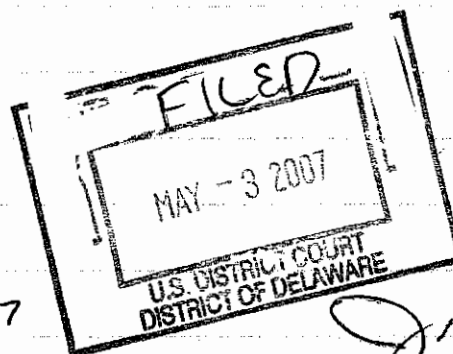
JIMMIE LEWIS

V.

CA. NO. 05-013 (GMS)

RAPHAEL WILLIAMS, ET AL

MOTION FOR DISCOVERY # 2
FOR DEFENDANTS RAPHAEL WILLIAMS
AND THOMAS L. CARROL PURSUANT
TO FED R. CIV P#S 26 AND 34



DATE: 4/27/07

Jimmie Lewis
SBI#506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DEL 19977

- 1.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE GRIEVANCES THE PLAINTIFF FILED WHILE HE WAS AT GANDER HILL A.K.A THE H.R.Y.C.I DATING FROM MAY 26, 2003 TO APRIL 7TH 2005.
- 2.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF ALL THE GRIEVANCES THE PLAINTIFF FILED WHILE AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 05 TO APRIL 7TH 07
- 3.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE HOUSING ASSIGNMENTS ASSIGNED TO THE PLAINTIFF WHILE HE WAS AT GANDER HILL DATING FROM MAY 26, 2003 TO APRIL 7TH 2005
- 4.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF ALL THE HOUSING ASSIGNMENTS ASSIGNED TO THE PLAINTIFF WHILE CONFINED AT THE DEL. CORR. CENTER FROM APRIL 7TH 05 TO APRIL 20TH 07.

- 5.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE DISCIPLINARY AND INCIDENT REPORTS REGARDING THE PLAINTIFF WHILE HE WAS AT GANDER HILL DATING FROM MAY 26, 03 TO APRIL 7TH 05.
- 6.) DEFENDANT THOMAS L CARROL PROVIDE COPIES OF ALL THE DISCIPLINARY AND INCIDENT REPORTS REGARDING THE PLAINTIFF AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07.
- 7.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE MEDICAL RECORDS GENERATED REGARDING THE PLAINTIFF DURING HIS STAY AT THE ~~DELMARWARENMENTAL~~ GANDER HILL PRISON DATING FROM MAY 26, 03 TO APRIL 7TH 05.
- 8.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF ALL THE MEDICAL RECORDS GENERATED REGARDING THE PLAINTIFF DURING HIS STAY AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07

9.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF THE HOUSING UNIT LOG BOOK ENTRIES REGARDING THE PLAINTIFF AT GANDER HILL DATING FROM MAY 26, 03 TO APRIL 7TH 05

10.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF THE HOUSING UNIT LOG BOOK ENTRIES REGARDING THE PLAINTIFF AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 05, TO APRIL 20TH 07

11.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF THE PLAINTIFF'S CLASSIFICATION FILE FROM GANDER HILL DATING FROM MAY 26, 03 TO APRIL 7TH 05.

12.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF THE PLAINTIFF'S CLASSIFICATION FILE FROM THE DEL. CORR CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07

13) DEFENDANT THOMAS L. CARROL PROVIDE ANY AND ALL VIDEO AND AUDIO SURVEILLANCE RECORDINGS REGARDING THE PLAINTIFF AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07

14.) DEFENDANT RAPHAEL WILLIAMS PROVIDE ANY AND ALL VIDEO AND AUDIO SURVEILLANCE RECORDINGS REGARDING THE PLAINTIFF AT THE H.R.Y / C.I DATING FROM MAY 26, 03 TO APRIL 7TH 05

15. DEFENDANT RAPHAEL WILLIAMS PROVIDE THE FULL AND CORRECT ADDRESSES OF THE FOLLOWING INMATE WITNESSES:

RONALD DAVIS SBI 346256, ROBERT GARRETT SBI 486164,
TIM REDDICK SBI 236669, TASHAWN EDWARDS SBI 439812,
LIONEL NELSON SBI # 322140, THOMAS GREGG SBI # 249520,
RAYMOND FARRARE SBI 498441, KEVIN HARVEY SBI 258316.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 27TH, DAY OF APRIL,
2007, THE MOTION FOR DISCOVERY # 2 FOR
DEFENDANTS RAPHAEL WILLIAMS AND
THOMAS L. CARROL TO FED R. CIV P#S 26 AND 34
BY U.S POSTAL, TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

ERIKA Y TROSS
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 6TH FL
WILMINGTON, DELAWARE 19801

DATE: 4/27/07

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